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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF OREGON**  
9 **MEDFORD DIVISION**

10 **In re the Matter of J.P. and E.P.:**

11 ARNAUD PARIS,

12 **Petitioner,**

13 **and**

14 HEIDI MARIE BROWN,

15 **Respondent.**

**Civil Action No. 1:24-cv-00648-AA**

**PETITIONER'S EMERGENCY  
MOTION FOR EXPEDITED  
HEARING TO SAVE THE  
CHILDREN SCHOOL YEAR IN  
FRANCE**

**NOTE ON MOTION CALENDAR:**  
**EXPEDITED HEARING REQUESTED**

16  
17 Mother just committed a child abduction in the middle of the school year in France:

18  
19 1. After their temporary 2022-2023 school year in Oregon both children had  
20 returned to their respective French schools in Paris in September 2023 and they were  
21 kidnapped from France by Mother two thirds into their school year that doesn't end till July  
22 6<sup>th</sup> 2024, sacrificing literally their school year if they can't return immediately to France.

23 2. Eva Paris is part of a school that is also a musical program in connection with  
24 the Paris Conservatory in which she's been studying violon for 3 years. Eva and her  
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**EMERGENCY MOTION TO SALVAGE THE  
CHILDREN'S FRENCH SCHOOL YEAR –**

1 classmates and formed this year an orchestra that is supposed to perform a concert in less  
2 than two months. Eva having been kidnapped by Mother in the final preparation of this  
3 concert will affect the entire class and orchestra dramatically and Eva must be feeling  
4 extremely bad from not being able to participate in these crucial months along with her  
5 classmates in Paris.  
6

7 3. Juliette Paris is equally part of a program at the Paris Conservatory but in  
8 classical dance and she was preparing a crucial audition with one of her best friends, Alma,  
9 that would allow them to join together in a 4-year dance program at the conclusion of their  
10 pre-school. Without being able to finish her dance year at the conservatory Juliette won't be  
11 able to apply to the audition with friend Alma which will strongly affect them both.  
12

13 4. The consequences of Mother kidnapping the children from France at this time  
14 of the school year are dramatic on both kid's future education and school in France which  
15 was filed first and was also the first to make a custodial determination about these children.  
16 Petitioner respectfully asks in the interest of the children that an expediated trial conference  
17 and hearing be held on the matter of returning the children to their French school within the  
18 next couple of weeks in order to salvage their school year.  
19

20 5. It is to be noted that just before this kidnapping Father had offered to  
21 participate in a mediation in France that Mother attended on the first meeting and used the  
22 second meeting to mislead Father to lower his guard. Father is still willing to continue this  
23 mediation process with Mother in France if Mother is willing to return the children to  
24  
25

1 France immediately and Father is still willing to offer Mother to get shared custody in  
2 France and to allow children to travel to the US every French vacation.  
3

4 6. For all these reasons it is crucial that the children don't become any further  
5 victims of this situation and that they be returned immediately by Mother to France in order  
6 to salvage their French school year and that the French custody proceedings that had been  
7 filed first and were first to judgment be properly concluded in France through Mother's  
8 appeal that is supposed to take place within a few months and in which Mother will be  
9 given a chance to argue that the first French decision should be revised to grant her custody  
10 of the children in the US or to relinquish jurisdiction to the Oregon courts.  
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13 **LEGAL ARGUMENT:**

14 22 USC § 9004(a) states in pertinent part that:  
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16 In furtherance of the objectives of article 7(b) and other provisions of the Convention, and  
17 subject to the provisions of subsection (b) of this section, any court exercising jurisdiction of  
18 an action brought under section 9003(b) of this title may take or cause to be taken measures  
19 under Federal or State law, as appropriate, *to protect the well-being of the child involved*[.]  
20

21 (Emphasis added.)

22 The well-being of the children includes that their school year shouldn't disrupted by the fact  
23 that Mother couldn't wait for her French appeal to conclude in the coming months. France  
24 was the first to be filed and to judgment. Mother was entitled to an appeal in France that  
25

1 she filed but by seeking a conflicting decision in the Oregon court in parallel has created a  
2 situation in which the children are becoming victims to the point of Mother being willing to  
3 sacrifice their school year to block them to the US.  
4

5 Father offered a mediation in France that could continue if Mother returns the children right  
6 away to France.  
7

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9 **CONCLUSION AND PRAYER FOR RELIEF:**

10 For the foregoing reasons, Mr. Paris seeks entry of an expedited order granting him a  
11 hearing for the return of the children to France to salvage their French school year in their  
12 respective conservatory programs. While the school year finished Petitioner commits to  
13 pursuing mediation with Mother in order to allow them to spend their entire summer  
14 vacation in Oregon with the American family and subsequent vacations or to agree to  
15 shared custody time in Paris which would be in the interest of the children to have both of  
16 their parents in their lives. The current judgment obtained without due process and the  
17 bench warrant issued a Mother's request in the Oregon court doesn't allow for the Father  
18 to be in the children's life in Oregon.  
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1 to be in the children's life in Oregon.  
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7 DATED this 18th day of April, 2024, in Paris, France  
8

9 Submitted by:  
10 Arnaud PARIS, Pro Per

11   
12

13 13 rue Ferdinand Duval  
14 §5004 Paris, FRANCE  
15 +33.6.88.28.36.41

16 **VERIFICATION**

17 I, Arnaud Paris, declare under penalty of perjury under the laws of the United States  
18 of America that the foregoing is true and correct.

19 SIGNED AND DATED this 18th day of April, 2024, in Paris, France.  
20

21 #  
22 #

23   
24

25 Arnaud Paris



## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITIONER'S EMERGENCY MOTION FOR EXPEDITED HEARING TO SAVE THE CHILDREN SCHOOL YEAR IN FRANCE** on the following party:

Heidi Marie Brown  
2256 Abbott Ave  
Ashland, OR 97520  
[heidimparis@gmail.com](mailto:heidimparis@gmail.com)  
Respondent

By the following method or methods:

\_\_\_\_\_ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorney(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

X by **emailing** full, true, and correct copies thereof to the attorney(s) at the email address shown above, which is the last known email address for the attorney(s) office, on the date set forth below.

\_\_\_\_\_ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

\_\_\_\_\_ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

DATED this 18th day of April, 2024, in Paris, France.

By:   
ARNAUD PARIS, Petitioner

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